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August 26, 2019

VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations; WT Docket No. 18-197**

Dear Ms. Dortch:

T-Mobile US, Inc. (“T-Mobile”) and Sprint Corporation (“Sprint,” collectively “Applicants”) are submitting this letter to adjust or clarify the confidentiality status of certain statements made by the Applicants on the record in this proceeding. In particular:

First, in the Cornerstone Report filed as Attachment A to the Applicants’ Nov. 6 Highly Confidential *ex parte* letter, the Applicants identified the following statement as Highly Confidential but are now removing that designation and treating the statement as public:

[W]e merge in zip code level demographic information from two data sources, the 2016 U.S. Census’ American Community Survey (“ACS”) and Experian. Using the ACS data, we ascribe to the NMP consumers in our data the median age, median household income, and share Hispanic or African-American of their home zip codes based on the ACS data. Using Experian, we ascribe to the NMP consumers in our data the average Experian VantageScore credit score of their home zip codes.<sup>1</sup>

Second, in the Compass Lexecon Declaration filed as Appendix F to the Applicants’ Joint Opposition, the Applicants identified the following statement as Highly Confidential but are now removing that designation and treating the statement as public: “less than \$3/subscriber/month.”<sup>2</sup>

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<sup>1</sup> Letter from Nancy J. Victory, Counsel to T-Mobile US, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 18-197, at Att. A pg. 103, ¶¶ 199-201, and n 121-123 (Nov. 6, 2018) (“Nov. 6 Letter”) (citations omitted).

<sup>2</sup> *Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations*, WT Docket No. 18-197, Joint Opposition of T-Mobile US, Inc. and Sprint Corporation at App. F, ¶ 6 (Sept. 17, 2018) (“Joint Opposition”).



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Third, in the Neville Ray Reply Declaration filed as Appendix B to the Applicants' Joint Opposition, the Applicants identified the following statement as Highly Confidential but are now removing that designation and treating the statement as public: "We have relied on the model to direct approximately \$2B in annual expenditures for our network (\$10B total in the past 5 years)." <sup>3</sup>

Fourth, the statement that New T-Mobile will keep the CDMA network in operation until the migration is complete was made publicly in the attachment to T-Mobile's March 8, 2019 *ex parte* letter and should be treated as a public statement. <sup>4</sup>

Finally, in the Cornerstone Report filed as Attachment A to the Applicants' Nov. 6 *ex parte* letter, the Applicants identified Cornerstone's description of the sampling characteristics of certain data in the second paragraph of page 24 as Highly Confidential, <sup>5</sup> but are now changing the designation to Confidential.

Please direct any questions regarding the foregoing to the undersigned.

Respectfully submitted,

**DLA Piper LLP (US)**

*/s/ Nancy Victory*

Nancy Victory  
Partner

cc: Kathy Harris  
Linda Ray  
Catherine Matraves  
Jim Bird  
David Krech  
Joel Rabinovitz

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<sup>3</sup> Joint Opposition at App. B, ¶ 13.

<sup>4</sup> Letter from Nancy J. Victory, Counsel to T-Mobile US, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 18-197, at Att. B, pg. 3 (Mar. 8, 2019).

<sup>5</sup> Nov. 6 Letter at Att. A, pg. 24, ¶ 58.